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January 23, 2023

VIA ECF

Honorable Sarah L. Cave
Southern District of New York

Re: Envy Branding LLC v. The William Gerard Group LLC, et al., No. 20-cv-3182

Dear Judge Cave:

We represent Plaintiff Envy Branding LLC and write jointly with Defendants pursuant to the Court's November 21, 2022 Order (ECF No. 66) to respectfully request an extension of the discovery deadline through March 3, 2023. The extension is necessary to accommodate two issues. First, we have experienced scheduling conflicts with a single remaining deposition witness, Defendant Chelsea DeBoer. This final deposition is currently scheduled for February 23, 2023 at 10:00 a.m. The parties seek an extension of time through the following week to allow for any additional discovery that may arise from the deposition, if any. All other depositions have already been completed, except for the deposition of Defendants' expert witness, John Begakis, which will take place on January 26, 2023. Second, Defendants are serving another set of requests for admissions after a meet and confer session conducted today to address issues pertaining to Plaintiffs' responses to the last set of requests for admissions. We anticipate that the responses to the new set will not require further court attention.

As such, below is a proposed stipulated revised discovery schedule the parties respectfully request that the Court So Order:

1. All discovery shall be completed by **March 3, 2023**.
2. By **March 10, 2023**, the parties shall file a letter certifying the completion of discovery, and indicating whether they seek a settlement conference with the Court.
3. Pre-motion letters regarding summary judgment motions shall be filed for the attention of the Honorable Jennifer L. Rochon by **March 20, 2023**, and opposition letters shall be filed by **March 31, 2023**.



Honorable Sarah L. Cave
January 23, 2023
Page 2

The parties further request that the Pre-Motion Conference currently scheduled for March 7, 2023 (ECF No. 67) be adjourned to **April 7, 2023**, or such other date as is convenient for the Court's calendar.

Respectfully submitted,

/s/ Matthew J. McDonald
Matthew J. McDonald

cc: All counsel via ECF